

**IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

UNITED STATES OF AMERICA)	
PLAINTIFF)	
)	
v.)	CASE NO. : 1:17-CR-027-JPJ-PMS
)	
JOEL A. SMITHERS)	
DEFENDANT)	

MOTION FOR FURLOUGH

COMES NOW the Defendant, Joel A. Smithers, by and through counsel, and moves this Honorable Court for a furlough to allow him to help his wife move residences. Angela Smithers, wife of Joel Smithers, has been unable to afford to pay the money to remain in their current housing. At the current time, she has no one to help her move locations and she needs to be out as soon as possible. The Defendant was found guilty by a jury of this Court and was denied bail pending his sentencing. The Defendant was compliant with probation and merely requests 5-7 days to be released to help his family move from one location to another in Greensboro, NC.

WHEREFORE, the Defendant Joel A. Smithers respectfully prays that his Motion for Furlough be granted.

RESPECTUFLLY SUBMITTED

JOEL A. SMITHERS

BY: /s/Don M. Williams, Jr.

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CERTIFICATE OF SERVICE

I, Don M. Williams, Jr., hereby certify that I have this the 22nd day of July, 2019, electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to the Assistant United States Attorney.

/s/ Don M. Williams, Jr.

DON M. WILLIAMS, JR.